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May 2, 2022

Hon. Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Fabio Younes Arboleda and Armando Gomez
18 Cr 262 (VEC)

Hon. Valerie Caproni:

I am counsel for Fabio Simon Younes Arboleda, who is scheduled for a change of plea hearing tomorrow, May 3, 2022, at 10 AM.

Mr. Younes' wife and two daughters are flying from Florida to New York to attend the hearing. Mr. Younes' wife has not seen him since he was extradited to the United States from Colombia.

Although we understand that the United States Marshal makes any decision about court security, we respectfully request a short non-contact visit either before or after the court appearance.

AUSA Jason Richman informs me that the Government takes no position on this application.

Sincerely,

/s/

Donald J. Yannella, Esq.